

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**Bay State Gas Company**

**D.T.E. 06-31**

**ATTORNEY GENERAL'S FIRST SET OF  
DOCUMENT AND INFORMATION REQUESTS**

- AG-1-1 Please provide copies of all discovery responses issued in response to requests from other participants in this proceeding.
- AG-1-2 For each of the years 1998 to 2005, please identify and produce a copy of the business plan for recovery of the Bay State acquisition premium. If no business plan was created to recover the acquisition premium, identify and produce all reports, memos or other documents that show the progress towards recovery of the acquisition premium.
- AG-1-3 For each of the years 1999 to 2005, please identify and produce a copy of the business plan for recovery of the Colombia Gas Company acquisition premium. If no business plan was created to recover the acquisition premium, identify and produce all reports, memos or other documents that show the progress towards recovery of the acquisition premium.
- AG-1-4 For each of the years 1998 to 2005, please identify and produce a copy of the monthly, quarterly and yearly budget targets for each department and cost category for Bay State.
- AG-1-5 From 1998 to 2005, produce all e-mails between Bay State, its holding company, parent company or service company regarding the budget documents produced in response to AG-1-4.
- AG-1-6 From 1998 to 2005, identify and produce all documents related to any type of management bonus or management incentive compensation plans, including in this response those bonus and incentive plans related to the documents produced in response to AG-1-2, AG-1-3 and AG-1-4.

AG-1-7 List the management individuals from Bay State, its holding company, parent company and service company (by title and employer) who were involved in establishing the budget targets related to the documents produced in response to AG-1-4.

AG-1-8 Produce copies of all Sarbanes-Oxley Act sign-offs, approvals and acknowledgments related to the Bay State's filing in DTE 05-27 and the documents produced in response to AG-1-2 and AG-1-4. Identify the Sarbanes-Oxley Act compliance officer at Bay State, its parent company, holding company and service company.

Dated: June 22, 2006